

**BLAKELEY LC**

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*Attorneys for The Clorox Sales Company*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

SEARS HOLDINGS CORPORATION, *et al.*,  
  
Debtors.

Chapter 11

Case No. 18-23538 (RDD)

Jointly Administered

**NOTICE OF APPEARANCE AND REQUEST FOR NOTICE AND SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Scott E. Blakeley of Blakeley LC, files this Notice of Appearance and Request for Notice and Service of Papers on behalf of The Clorox Sales Company, pursuant to Section 1109(b) of the Bankruptcy Code and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and requests, pursuant to Bankruptcy Rules 2002, 3017, and 9007 and Sections 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in this bankruptcy case be given and served on The Clorox Sales Company by serving:

Scott E. Blakeley ([SEB@BlakeleyLC.com](mailto:SEB@BlakeleyLC.com))  
Blakeley LC  
530 Technology Drive, Suite 100  
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(949) 260-0612 – Direct

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or information, written or oral, and whether transmitted or conveyed by mail, messenger delivery,

telephone, facsimile, telegraph, telex or otherwise filed or made with regard to the referenced case and proceedings herein.

This Notice of Appearance and Request for Notice and Service of Papers shall not be deemed or construed to be a waiver of the rights of The Clorox Sales Company (i) to have final orders in noncore matters entered only after de novo review by a district judge, (ii) to trial by jury in any proceeding so triable in this case or any case, controversy or proceeding related to this case, (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) to assert or exercise any other rights, claims, actions, setoffs or recoupments to which The Clorox Sales Company is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved

Respectfully submitted,

Dated: May 4, 2022

By: /s/ Scott E. Blakeley  
Scott E. Blakeley  
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*Counsel for The Clorox Sales Company*

### **CERTIFICATE OF SERVICE**

This is to certify that on May 4, 2022, a true and correct copy of the above and foregoing Notice of Appearance and Request for Notice and Service of Papers was filed with the court via CM/ECF and served on all parties requesting electronic notification

/s/ Scott E. Blakeley  
Scott E. Blakeley